

Compliance Letter

November 28, 2005

VIA FCC Electronic Filing System

Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: DSL.net E-911 Compliance Letter – WC Docket No. 05-196

Dear Ms. Dortch:

This letter is being delivered to you by DSL.net, Inc. (the “*Company*”), pursuant to the order of the Federal Communications Commission (the “*FCC*”) dated June 3, 2005, *IP-Enabled Services and 911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking (the “*VoIP 911 Order*”) and in accordance with FCC Public Notice DA 05-2945 released November 7, 2005.

Please be advised that that the Company is currently in compliance with the VoIP 911 Order and has taken the following actions in respect to the VoIP 911 Order:

1. ***Compliance with June 29, 2005 FCC Rule Making.*** Before July 28, 2005, the Company: (a) provided each of its customers a detailed, written notification of the Company’s E911 service capabilities (the “*Company’s Notification*”), including a description of those circumstance in which the Company’s E911 services will not be available to its customers; (b) received written acknowledgements from each of its VoIP customers confirming that such customers had received and understood the Company’s Notification; and (c) delivered warning stickers to each of its VoIP customers to be placed on their VoIP handsets, warning customers that in certain circumstances such telephones would not be capable of connecting to emergency services and providing a Company web page location where customers could view more details on the Company’s E911 service capabilities. The Company currently notifies each of its new customers of its E911 service capabilities before commencing service for such new customers.

2. 911 Solution. The Company is currently able to and does provide 911 services in compliance with the VoIP 911 Order to 100% of its VoIP customers.

The Company interconnects directly with the traditional wireline telephone companies to provide E911 service. Such service routes 911 emergency services calls through the Wireline E911 Network to the nearest public safety answering point (PSAP) that serves the Registered Location of the caller. The Company's E911 service is available 7 days per week, 24 hours per day. Upon activation of a customer's VoIP service, the Company, through its 911 service vendor, Intrado, enters the customer's Registered Location and Automatic Numbering Information ("ANI") into the local automated location identifier ("ALI") enhanced 911 database. When establishing new VoIP service, porting additional telephone numbers or adding additional new telephone numbers for its customers, the Company provides updated ANI and Registered Location Information to Intrado which, in turn, updates the ALI enhanced 911 database with the new information. While the Company's 911 service is completely functional upon activation of its VoIP service, such that customers are instantly able to dial 911 and reach the assigned public safety answering point to report an emergency, the enhanced feature of displaying the customer's ANI and Registered Location may not be immediately available until such information is posted into the ALI enhanced 911 database. The Company submits to Intrado E911 database changes on a daily basis when changes are reported by customers to the Company. While changes are normally posted to the ALI enhanced database within 48 hours following receipt by Intrado, in some cases, and in compliance with industry standards, it may take up to 3 business days or longer for such submitted changes to post to such database.

A limited number of the Company's customers have nomadic VoIP features that enable them to use their VoIP service with the Company from a remote site (for example, a customer or a customer's employee works from home or from a location other than the fixed Registered Location for the customer's VoIP service) or have nomadic services that enable them to utilize the Company's VoIP service from any IP address within the Company's VoIP Network Footprint (defined below). Under these limited situations, the Company requires that affected customers provide the Company with 10 days' advanced notice if they intend to use their VoIP service at locations other than their most current Registered Locations on file with the Company. The Company has notified each of its affected customers of the foregoing requirement and provided such customers with an easy-to-follow procedure for updating their location to the Company in advance of any move. The Company has advised those customers that if the customer does not update their location information 10 days in advance of any move, the customer will not be able to reach the appropriate PSAP at their new location in the event of an emergency until such update information is received by the Company and loaded into the ALI enhanced 911 database. The Company has also advise these customers that the Company only maintains the most recent Registered Location of a customer and that if a customer reports a change and then returns to the customer's original Registered Location or a new location, the customer must again provide the Company with 10 days advanced notice of such location change to enable the Company to update the customer's Registered Location information into the ALI enhanced 911 database.

The Company currently provides VoIP services in the New York Metropolitan area, including Greenwich, Connecticut (LATA 132), and in the Washington D.C. Metropolitan, including Maryland and Virginia (LATA 236) (collectively, the “*Company’s VoIP Network Footprint*”). The Company connects to selective routers within this network footprint. In respect to that limited number of the Company’s VoIP customers using nomadic services that enable such customers to use their telephones from any location, the Company restricts access to its VoIP network sole from IP addresses within the Company’s VoIP Network Footprint. The Company does not currently engage any service vendor to provide national 911 service. The Company continues to evaluate the business case for offering national VoIP access to support nomadic VoIP service offerings but does not currently provide such services.

- **911 Routing Information/Connectivity to Wireline Network.** The Company is in compliance with Paragraph 42 of the VoIP 911 Order in that the Company connects to selective routers within the Company’s VoIP Network Footprint and all 911 calls are handed-off to the appropriate selective router that directs 911 calls to the appropriate PSAP serving the Registered Location of the 911 caller. As of November 28, 2005, the Company connects, either directly or indirectly, to seventeen (17) selective routers within the Company’s VoIP Network Footprint. As part of its connectivity architecture, the Company maintains seventeen (17) dedicated TI circuits to 911 tandems. Such facilities are grouped into serving areas to ensure redundancy in the event of a service failure at any one or more tandems (i.e. for the Company’s Greenwich, Connecticut service area within LATA 132, the Wireline 911 Network maintains three (3) separate tandems to which the Company is connected).

- **Transmission of ANI and Registered Location Information.** The Company transmits all 911 calls over its VoIP network via the Wireline E911 Network. Each transmission includes the caller’s ANI, but not such caller’s Registered Location. Separately, through services provided Intrado, the Company updates regularly (as specified in more detail above) each customer’s Registered Location into the ALI enhanced 911 database. When a 911 call is transmitted by the Company over the Wireline E911 Network, the receiving PSAP queries the ALI database to perform a look-up of the Registered Location corresponding to the transmitted ANI. To the best of the Company’s knowledge after researching various information sources, the Company believes that all of the PSAPs in the Company’s VoIP Network Footprint are capable of receiving and processing ANI and Registered Location information. The Company is still awaiting confirmation of the capabilities of the PSAPs in Washington D.C. proper and in and Westchester County, New York. The Company transmits the applicable ANI information with each and every one of its 911 calls, and causes Intrado to update the ALI database with its customers’ current Registered Locations on a regular and systematic basis. Accordingly, the Company believes that 100% of its caller’s ANI are being transmitted and received by the applicable PSAPs and that the Registered Locations of those callers are being properly identified when the ALI database is queried by the recipient PSAP when the call is received.

- **911 Coverage.** As stated above, the Company believes it is in full compliance with the requirements of the VoIP 911 Order within the Company’s VoIP Network

Footprint. The company does not currently subscribe to a national 911 provider and accordingly limits access to its VoIP network only from IP addresses within the Company's VoIP Network Footprint.

3. **Obtaining Initial Registered Location Information.** As part of the Company's VoIP service provisioning process, all new VoIP customers' telephone numbers, addresses and related information are added to the Company's billing system within one (1) business day following the Company's porting (and 24 hour monitoring) of such telephone numbers. The following business morning, the Company queries its billing system for the name, ANI and Registered Location of each active VoIP customer and transmits that data to Intrado which, in turn, uploads such updated information into the ALI enhanced 911 database. Normally, a customer's Registered Location and ANI information is updated in the ALI enhanced 911 database within 48 hours following the Company's delivery of such information to Intrado. However, in some cases, and within industry standards, it may take up to 3 business days or longer for such submitted changes to post to the ALI enhanced 911 database.

4. **Obtaining Updated Registered Location Information.** A substantial majority of the Company's customers have fixed Registered Locations. Accordingly, for those customers, the Company utilized the procedures set forth in Item 3 above when such customers add additional lines or port existing lines from other providers to the Company. As discussed in more detail in Item 2 above, only a limited number of the Company's customers have nomadic VoIP features that enable them to use their VoIP service with the Company from a remote locations. With respect to these customers, the Company requires that they provide the Company with 10 days' advanced notice if they intend to use their VoIP service at a location other than the most current Registered Location of the customer on file with the Company. The Company has notified each of its affected customers of the foregoing requirement and provided such customers with an easy-to-follow procedure for updating their location to the Company in advance of any move. The Company has advised those customers that if the customer does not update their location information 10 days in advance of any move, the customer will not be able to reach the appropriate PSAP at their new location in the event of an emergency until such update information is received by the Company and loaded into the ALI enhanced 911 database. The Company has also advise these customers that the Company only maintains the most recent Registered Location of a customer and that if a customer reports a change and then returns to the customer's original Registered Location or a new location, the customer must again provide the Company with 10 days advanced notice of such location change to enable the Company to update the customer's Registered Location information into the ALI enhanced 911 database.

5. **Technical Solution for Nomadic Customers.** The Company currently has a limited number of VoIP customers with nomadic services that enable such customers to use their telephones from any location. Because the Company does not currently subscribe to a national enhanced 911 solution, the Company permits access to its VoIP network only from IP addresses within the Company's VoIP Network Footprint. Accordingly, users of the Company's nomadic services may only use their nomadic features on the Company's network within the Company's VoIP Network

Footprint. Additionally, users of nomadic services are instructed to follow the Registered Location update procedure described in Item 3 above, each time they intend to use their nomadic features within the Company VoIP Network Footprint at locations other than their then current Registered Locations.

The Company is pleased to submit this Compliance Letter to the FCC and will provide any additional information that the FCC deems necessary in respect to the VoIP 911 Order.

I, Lucie Poulicakos, state that I am the Vice President of Operations of the Company; that I am authorized to submit this Compliance Letter on behalf of the Company; that this Compliance Letter was prepared under my direction and supervision; and that I declare under penalty of perjury that this Compliance Letter is true and correct to the best of my knowledge, information and belief.

/s/ Lucie Poulicakos
Lucie Poulicakos,
Vice President - Operations
DSL.net, Inc.